

	<p><b>California Public Utilities Commission</b> <b><i>Mitigation Monitoring, Compliance, and Reporting Program</i></b></p>
	<p><b>South of Palermo 115 kV Reinforcement Project</b></p> <p><b>Compliance Status Report: 13</b></p> <p><b>July 31, 2019</b></p>

**SUMMARY**

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Initial Study (FIS)/Mitigated Negative Declaration (MND) for the South of Palermo 115 kV Reinforcement Project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FIS/MND to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the CPUC’s third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. Photos of site observations are included in Attachment A of this report. Summaries of the Notices to Proceed (NTP) and Minor Project Refinements (MPR) are provided in Attachments B and C, respectively.

This compliance status report covers construction activities from July 1 through July 31, 2019.

**CONSTRUCTION SCHEDULE AND PROGRESS**

PG&E began construction activities associated with NTP-1 on July 1, 2018. Additional construction activities associated with NTP-2 were started concurrently on September 6, 2018. Construction of additional project elements associated with NTP-3 were started on March 27, 2019. All project activities are scheduled to be complete by the end of 2021.

Tower crews continued to install foundations along the northern portion of the South of Palermo Line. Transmission line crews continue to work on non-project related Wild Fire Safety Inspections. The civil crews have continued to prepare all-weather locations on the remainder of the South of Palermo Line.

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING**

***Site Inspections/Mitigation Monitoring***

A CPUC third-party EM conducted site observations in areas under active construction. Areas of active and inactive construction were observed to verify implementation of the mitigation measures stipulated in the project’s MMCRP. Observations were documented using site inspection forms and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

### ***Implementation Actions***

Activities observed during this period included gravel removal at Pull Site (PS) 1/13, foundation drilling, foundation abutment pole installation (see photo 1), and concrete pouring and setting at foundation sites. During this reporting period, non-project related road grading occurred near site 33/248. The biological monitors associated with the South of Palermo reinforcement project were in contact with the manager of the road grading operation in order to communicate regarding environmental resources and project work schedules in the area (see photo 2).

The CPUC EM observed sensitive resource area signs clearly posted in accordance with APM BIO-12 (see photo 3). Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) such as silt fencing were also observed in good condition in accordance with APM HYDRO-1.

Preconstruction surveys and construction monitoring for the giant garter snake (GGS) were conducted in areas with appropriate habitat, as required by APM BIO-9.

### ***Mitigation Measure Tracking***

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking table. A complete list of mitigation measures and applicant proposed measures is included in the FIS/MND in the Decision for the Power Line Reinforcement Project, as adopted by the CPUC on May 16, 2018 (Decision 18-05-014) and the MMCRP.

### ***Compliance Status***

No minor deviations or non-compliances were issued this reporting period.

## ATTACHMENT A Photos

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**Photo 1:** New abutment pole set at foundation site 33/248.

## ATTACHMENT A (Continued)



**Photo 2:** Non-project related road grading occurred near site 33/248. The biological monitors associated with the South of Palermo project were in contact with the manager of the road grading operation in order to communicate regarding environmental resources and project work schedules in the area.

## ATTACHMENT A (Continued)



**Photo 3:** Gravel removal work at PS 1/13. A biological monitor was onsite to monitor work activities due to work site being within potentially suitable GGS habitat, in accordance with APM BIO-9.

## ATTACHMENT A (Continued)



**Photo 4:** Sensitive resource areas were marked clearly with signage in accordance with APM BIO-3 at Site 32/242.

## ATTACHMENT B Notices to Proceed

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NTP No.	Date Issued	Description	Conditions Included (Y/N)
CPUC - 001	June 14, 2018	Construction activities at select locations along the Bogue Sub-Line Segment, the Pease Sub-Line Segment, and the South of Palermo Line.	Y
CPUC - 002	September 6, 2018	Construction activities which would take place concurrently with work covered under NTP-1 at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line.	Y
CPUC - 003	March 27, 2019	Construction activities at select locations along the Rio Oso Sub Segment, the Pease Sub Line Segment, and the South of Palermo Line.	Y

## ATTACHMENT C

### Minor Project Refinement Request

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Minor Project Refinement Request No.	Submitted	Description	Status	Approval
001	July 09, 2018	Requested to add an approximately 400-by-600 foot landing zone/pull site along the Pease Sub-Line Segment and also the relocation of an approximately 200-by-200 foot landing zone along the Bogue Sub-Line Segment.	Approved	07/19/18